

1 Plaintiff DIANNA JOUAN (“Plaintiff”) and Defendant THE BOARD OF TRUSTEES
2 OF THE LELAND STANFORD JUNIOR UNIVERSITY (erroneously sued as “THE LELAND
3 STANFORD JR. UNIVERSITY”) (“Defendant”) (collectively, the “Parties”) hereby stipulate
4 and agree as follows:

5 Whereas, the Parties attended the Hearing to Modify the Scheduling Order (“Hearing”)
6 on September 27, 2023;

7 Whereas, as a result of the Hearing, the Court agreed to extend the fact discovery
8 deadline to November 17, 2023;

9 Whereas, although all other deadlines remain set, the Court invited the Parties to submit
10 a stipulation regarding a revised discovery plan and deposition schedule to the Court to help
11 streamline outstanding discovery efforts;

12 Whereas, the Parties understand that some limited modifications to the below schedule
13 may be necessary to accommodate witness availability/ timing and intend to meet and confer as
14 necessary;

15 Whereas, the Parties also intend to continue to engage in efforts to resolve the case by
16 way of mediation and/or other facilitated settlement discussions through alternative dispute
17 resolution options;

18 Whereas, Plaintiff was unable to conduct the depositions as originally planned on
19 October 9 and 11 due to defense counsel’s unavailability;

20 Whereas, the Parties are meeting and conferring about additional written discovery and
21 documentation needed in order to complete the upcoming depositions with relevant
22 documentation available;

23 Whereas, in light of these circumstances, the Parties agreed to the slightly revised
24 schedule to complete depositions and necessary written discovery per Defendant’s request and
25 to avoid prejudice to either side;

THEREFORE, IT IS HEREBY STIPULATED by and between the Parties that, the proposed discovery plan is revised as follows:

<u>Depositions</u>	<u>Proposed Dates</u>
Hina Qureshi Jesslyn Rumbold	October 13, 2023
Linda Usoz	October 17, 2023
Yun-Ting Yeh	October 19, 2023
Erin Campbell	October 20, 2023
Ruth Reyes Johnson	October 23, 2023
Garry Gold	October 24, 2023
Dawn Freeman	October 27, 2023
Dianna Jouan	November 7, 2023

Pursuant to Local Rule 5-1(h)(3) the filer of this document attests that concurrence in the filing of the same has been obtained from each of the signatories.

Dated: October 11, 2023

QUINTANA HANAFLI, LLP

By: /s/ Rory C. Quintana
RORY C. QUINTANA
 Attorneys for Plaintiff
 DIANNA JOUAN

Dated: October 11, 2023

GORDON REES SCULLY MANSUKHANI, LLP

By: /s/ Sara A. Moore
LINDA M. MORONEY
SARA A. MOORE
MATTHEW A. MALLET
 Attorneys for Defendant
 THE BOARD OF TRUSTEES OF THE
 LELAND STANFORD JUNIOR UNIVERSITY